

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 4:19-cr-00341

v.

JOSE M. GONZALEZ-TESTINO,

Defendant.

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**DEFENDANT JOSE M. GONZALEZ-TESTINO'S
UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL
UNOPPOSED MOTION FOR TEMPORARY RELEASE OF THE U.S. PASSPORT OF
WALTER ALEXANDER GONZALEZ-TESTINO AND TO PERMIT TRAVEL**

Defendant, Jose Manuel Gonzalez-Testino, respectfully files this unopposed motion for leave to seal his Unopposed Motion for Temporary Release of the U.S. Passport of his brother, Walter Alexander Gonzalez-Testino and to permit the latter's travel, and proposed order granting same. In support of this motion, counsel would show the following:

1. The motion and proposed order contains information of where Walter Alexander Gonzalez-Testino would be traveling, and the personal reasons for his visit.
2. A popular Venezuelan blog had previously reported that this Court granted another co-surety, Ms. Maria Alejandra Diaz's motions to travel.
3. Mr. Gonzalez-Testino is concerned that his family's safety will be compromised if his brother's travel is revealed to the public. Sealing this motion will contribute to his, and his family's continued security.
4. This Court previously granted motions to seal docket entries 95, 86 and 68 for co-surety Maria Diaz for the same purpose.

WHEREFORE, Defendant Jose Manuel Gonzalez-Testino moves this Honorable Court to seal Mr. Gonzalez-Testino's Unopposed Motion for Temporary Release of the U.S. Passport of his brother Walter Alexander Gonzalez-Testino and to permit him to travel, and proposed order filed simultaneously herewith.

CERTIFICATE OF CONFERENCE

The undersigned counsel of record for the Defendant, Jose Manuel Gonzalez-Testino, hereby certifies that he has conferred with DOJ Trial Attorney Sarah Edwards who states that she has no objection to this motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 27th day of October, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served this day on all counsel of record either via transmission of Notices of Electronic Filing generated by CM/ECF or in another authorized manner for those counsel or parties not authorized to receive electronically Notices of Electronic Filing.

/s/ Edward R. Shohat

EDWARD R. SHOHAT